

A CLEC would be unable determine if these calls are local or IXC transported, resulting in inaccurate reconciliation of a CLEC's UNE bills.

March 7, 2000

## **OBSERVATION REPORT #41**

**KPMG observed missing, unknown, incorrect and untimely charges on several bills.**

### **Issue 41.1**

KPMG found unknown service order charges on its UNE Loop Bill.

KPMG found an unknown service order charge for \$12.82 associated with two separate orders on its UNE Loop Bill.<sup>1</sup> This rate could not be found in KPMG's Interconnection agreement with Bell Atlantic, or in the DTE tariff.

### **Issue 41.2**

KPMG was not billed several service order charges associated with an order.

On KPMG's January 6, 2000 Y40 Bill (number 617 Y40-0013 156), KPMG was not billed several of the Other Charges and Credits specific to a migration order (Service order # C5PA5423 completed on 12/15/99). The following charges were not billed as expected:

<b>Item No.</b>	<b>Type of charge</b>	<b>USOC</b>	<b>USOC Description</b>
1.	Monthly recurring	POR1X	Telephone number portability cost recovery surcharge
2.	One-time	NR9KD	ISDN Expedite Service Order – 1 Link
3.	One-time	NR9GU	Modification Charge – Add/Change/Delete

POR1X appears on the account CSR and is billed on that account on a monthly recurring basis. NR9KD and NR9GU were shown on the completion notice for the order, and both have defined rates in KPMG's Interconnection Agreement with Bell Atlantic.

### **Issue 41.3**

KPMG was billed an incorrect amount for changing the presubscribed interexchange carrier (PIC)<sup>2</sup> on one of its end-user's accounts.

<sup>1</sup> The account number for the UNE Loop bill is 617 014-7406 969 008 1, with a bill period of December 6 – January 5, 2000. The associated Loop Summary bill number is 617 815-4609 360, with a bill period of January 1 – January 31, 2000.

<sup>2</sup> PIC more commonly refers to the long-distance carrier that the end-user has on his/her account.

KPMG submitted a service order to change the PIC on an end-user's account.<sup>3</sup> The correct rate for this change is \$5.00 minus a 24.99% discount because this change was applied to a resale account.<sup>4</sup> The resulting rate should be \$3.75.

In contrast, KPMG was billed \$2.81. This appears to represent the \$5.00 charge discounted twice by 24.99%. In other words:

$$[\$5.00 \times (1-.2499)] \times (1-.2499) = \$2.81$$

DTE Tariffs, FCC Tariffs, or the Bell Atlantic Handbook do not include any documentation of a process for deriving the resulting rate.

#### **Issue 41.4**

KPMG was not billed for several service order charges as expected.

KPMG should have received charges for "service connection – other" (USOC = NR9KK). Per KPMG's Interconnection Agreement with Bell Atlantic, NR9KK carries a rate of \$2.26 per port which is applied as a non-recurring, service migration/conversion order charge. In the following instances, KPMG was not billed, but should have been billed, a "service connection – other" charge:

<b>Item Number</b>	<b>Bill Number</b>	<b>Bill Date</b>	<b>Service Order Number</b>	<b>Issue</b>
1.	617 Y40-0013 156	1/6/00	CSUE2480	Charge was not applied to one of the two lines migrated to UNE-P. (TN 617-372-8515)
2.	617 Y40-0013 156	2/6/00	N5PA5519	Charge was not applied to one of the two lines migrated to UNE-P. (TN 617-338-1778)
3.	617 Y40-0013 156	2/6/00	N5TH3150	Charge was not applied to one of the two lines migrated to UNE-P. (TN 617-338-7547)

<sup>3</sup> The charge appears on the 12/31/99 resale bill, bill number 508 Q05-0135 135. The associated service order is CSUA3599 and the end-user's telephone number is 781-292-9670. The order completed on 12/20/99.

<sup>4</sup> The \$5.00 rate for the PIC change can be found in the DTE Tariff #15, Section 30.14.1. The 24.99% discount is illustrated in the DTE Tariff #14, Section 10.5.1.

#### **Issue 41.5**

KPMG observed missing late payment charges on several bills.

KPMG should have received late payment charges on the following February bills:

<b>Item No.</b>	<b>Bill Number</b>	<b>Bill Date</b>	<b>Charges Applicable to Late Payment Charges</b>
1.	617 Y40-0013 156	02/06/2000	Monthly access charges and other charges and credits billed on the Dec. 6, 1999 bill
2.	413 Y40-0014 104	02/06/2000	Monthly access charges billed on the December 6, 1999 bill.

#### **Issue 41.6**

The subtotal for monthly charges on one of KPMG's customer service records is incorrect.

On KPMG's February 6, 2000 Y40 bill (number 617 Y40-0013 156), the subtotal for OCL "BSTNMABODS9" is not equal to the sum of the individual monthly charges that appear in that OCL. The sum of the individual charges is \$121.93, yet the subtotal for that OCL is shown as \$135.58. KPMG was billed for monthly access charges using \$135.58 as the amount for that OCL.

#### **Issue 41.7**

KPMG has been billed certain service order charges it should not have incurred.

A) KPMG's 12/31/99 resale bill (number 508 Q05-0135 135) included a "Service Ordering – Other Charge" on a residential account.<sup>5</sup> KPMG should not have incurred this charge, which resulted from submitting a request to change the class of service on an end user's account from 1MR (measured residence service) to 1FR (unlimited local residence service). This request should be classified as a request to change from measured residence basic exchange service to unlimited residence basic exchange service.

As stated in the DTE MA No. 10 Tariff, Part A, Section 3, p. 3, 3.2.1.D, "Service charges do not apply to the following changes or requests. 3) A change from measured residence basic exchange service to unlimited residence basic exchange service." Consequently, KPMG should not have been billed \$5.70 for "Service Ordering – Other Charges."

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<sup>5</sup> The telephone number associated with the account in question is 413-564-8306. The service order number is C5TB7044, with an associated purchase order number of 19012061999001.

B) The 12/31/99 resale bill (number 508 Q05-0135 135) includes "Service Ordering – Other Charges" for a change to a business account's class of service. KPMG requested a class of service change from 1MB to 1FB that is associated with a higher rate. Therefore, this change in record should be classified as a change that primarily benefits the Telephone Company.<sup>6</sup>

As stated in the DTE MA No. 10 Tariff, Part A, Section 3, p. 3, 3.2.1.D: "Service charges do not apply to the following changes or requests. 4) Requests which result in a change in records which primarily benefit the Telephone Company." Consequently, KPMG should not have incurred the \$26.04 for "Service Ordering – Other Charges."

#### **Issue 41.8**

KPMG was not billed in a timely manner for a certain service order.

KPMG was not billed for a service order that should have appeared on the 12/31/99 resale bill (number 508 Q05-0135 135). The service order requested the addition of two lines to a business account.<sup>7</sup> KPMG received a billing completion notice from Bell Atlantic stating that the order was completed on 12/21/99.

The Other Charges and Credits section of the 12/31/99 bill does not include this service order. In addition, the Customer Service Record associated with the bill does not reflect the new lines for this account. Given that the order completed on 12/21/99, associated charges should have appeared on the 12/31/99 resale bill given the billing cycle.

#### **Assessment**

If CLECs are not billed charges that are complete, known, correct and billed in a timely manner they will have difficulty billing their end users appropriately.

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<sup>6</sup> The telephone number associated with the account in question is 781-263-7010. The service order number is C5PP0991, with an associated purchase order number of 22112081999001.

<sup>7</sup> The service order number is C5UH6487. The associated purchase order number is 19812091999001. The account telephone number is 617-372-8510.

March 21, 2000

## **ADDENDUM #1 TO OBSERVATION REPORT #41**

**KPMG observed missing, unknown, incorrect and untimely charges on several bills.**

### **Issue 41.9**

KPMG is experiencing incomplete and inaccurate information and charges on its Administrative bills.

KPMG was billed incorrectly for an inaccurate quantity and incomplete set of *records processed* and *local usage transmission*. The tables below compare the quantity of records processed shown on the Administrative bill<sup>1</sup> to the actual quantity of usage records processed by Bell Atlantic and sent to KPMG.<sup>2</sup>

Admin. Bill (Bill Pd. Dec. 5 – Jan. 4, 2000) Bill No. 508 Q10-0068 068 005 2			Actual Usage Records Received by KPMG	
#	Date	Quantity	Date	Quantity
1	12/7/99	Not Present on Bill	12/7/99	17
2	12/9/99	Not Present on Bill	12/9/99	1
3	12/14/99	Not Present on Bill	12/14/99	13
4	12/15/99	Not Present on Bill	12/15/99	94
5	12/16/99	Not Present on Bill	12/16/99	129
6	12/17/99	Not Present on Bill	12/17/99	85
7	12/20/99	120	12/20/99	3
8	12/21/99	82	12/21/99	3
9	12/22/99	41	12/22/99	9
10	12/23/99	18	12/23/99	11
11	12/27/99	5	12/27/99	18
12	12/29/99	3	12/29/99	13
13	12/30/99	7	12/30/99	19
14	12/31/99	Not Present on Bill	12/31/99	5
15	01/01/00	Not Present on Bill	01/01/00	3
16	01/03/00	6	01/03/00	9

<sup>1</sup> Based upon conversations with the BA's resale billing help desk, as well as information provided by BA in the Customer Service Activation Letter, KPMG understands that the date for records processed and local usage transmission corresponds to the date a call was made on a KPMG end user account. Further, the appropriate unit for the quantity of records processed and local usage transmission is one record per call.

<sup>2</sup> The quantity of records processed should equal the local usage transmitted to KPMG. For the purposes of this observation, KPMG assumes that the quantities are the same and therefore does not list records processed and local usage transmission separately.

Admin. Bill (Bill Pd. Jan. 5 – Feb. 4, 2000) Bill No. 508 Q10-0068 068 005 2			Actual Usage Records Received by KPMG	
#	Date	Quantity	Date	Quantity
1	1/5/00	5	1/5/00	11
2	1/6/00	Not Present on Bill	1/6/00	17
3	1/7/00	Not Present on Bill	1/7/00	23
4	1/8/00	Not Present on Bill	1/8/00	9
5	1/9/00	Not Present on Bill	1/9/00	5
6	1/10/00	Not Present on Bill	1/10/00	34
7	1/11/00	Not Present on Bill	1/11/00	31
8	1/12/00	Not Present on Bill	1/12/00	20
9	1/13/00	3	1/13/00	27
10	1/14/00	Not Present on Bill	1/14/00	25
11	1/15/00	Not Present on Bill	1/15/00	7
12	1/16/00	Not Present on Bill	1/16/00	8
13	1/17/00	Not Present on Bill	1/17/00	15
14	1/18/00	Not Present on Bill	1/18/00	22
15	1/19/00	Not Present on Bill	1/19/00	23
16	1/20/00	Not Present on Bill	1/20/00	13
17	1/21/00	Not Present on Bill	1/21/00	13
18	1/28/00	3	1/28/00	0
19	2/2/00	7	2/2/00	0
20	2/3/00	5	2/3/00	0

If the bill does not accurately reflect usage data provided to CLECs, the CLECs are billed an incorrect amount.

#### **Issue 41.10**

KPMG was charged incorrectly for a duplicate copy of a bill.

KPMG requested one duplicate copy each month of its UNE Loop Bill on magnetic tape.<sup>3</sup> On both the January 1 – January 31, 2000 and February 1 – February 29, 2000 Loop Summary Bills, KPMG was charged \$100 in Summary Bill Current Charges. KPMG contacted the UNE Billing Help Desk to determine the reason for this charge. The Help Desk indicated that \$100 was for the magnetic tapes KPMG was receiving. According to KPMG's Interconnection Agreement with Bell Atlantic, the cost of a duplicate bill on magnetic tape is \$30.86 per bill. Therefore, KPMG was incorrectly charged for this duplicate copy.

#### **Issue 41.11**

KPMG was not billed for a service installation charge.

KPMG was not billed for an installation charge when ordering a new line on a UNE-P account. Specifically, KPMG was not charged for the USOC SEPU4, which carries a rate

<sup>3</sup> The associated Loop Summary Bill Number is 617 815-4609. KPMG receives the original copy of the bill in paper format.

of \$10.74. This rate is found in KPMG's Interconnection Agreement with Bell Atlantic as a "Tariff or SGAT Rate" and is assigned on a "per line port" basis. In addition, SEPU4 is listed on the Billing Completion Notices for these new lines.

Following are the instances in which KPMG should have incurred this charge:

Item No.	Bill Number	Bill Date	Service Order Number	New Line's Telephone Number
1.	413 Y40-0014 104	1/6/00	C5UM1722	413-572-4406
2.	617 Y40-0013 156	1/6/00	C5UJ1133	781-726-7386
3.	617 Y40-0013 156	2/6/00	C5UP8072	781-292-9671
4.	617 Y40-0013 156	2/6/00	N5XU8096	617-720-3732
5.	617 Y40-0013 156	2/6/00	N5TP0140	617-227-2875 and 617-227-2829
6.	617 Y40-0013 156	2/6/00	N5XU8340	617-720-3581

#### **Issue 41.12**

KPMG was charged incorrectly for a decrease in charges on a service order.

For service order # D5UP8077 on KPMG's 1/31/00 resale bill, KPMG was given a credit for a *decrease in charges* instead of a debit.<sup>4</sup> Decreases in charges on Other Charges and Credits should incur a debit. For example, on this same bill, service order number D5XZ1098 for account 617-372-8136 had a positive, decrease in charges value of \$8.62.

#### **Issue 41.13**

The monthly charges on a KPMG bill do not match the account total from the customer service record.

For resale bill number 508 Q05-0135 135 for 12/31/99, the monthly charges on the bill do not match the CSR account total. The monthly charges are \$2207.70, yet the CSR account total is \$2193.14.

#### **Assessment**

If CLECs are not billed charges that are complete, known, correct and billed in a timely manner they will have difficulty billing their end users appropriately.

<sup>4</sup> The associated bill number is 508 Q05-0135. The account telephone number is 617-372-8517. The purchase order number is 2151209199900.



**ADDENDUM #2 TO OBSERVATION REPORT #41**

**KPMG observed missing, unknown, incorrect and untimely charges on several bills.**

**Issue 41.14**

KPMG was billed for usage generated on 1/31/00, though the usage billing cycle from and thru dates are 12/31/99 and 1/30/00, respectively.<sup>1</sup> Following is the bill information for this charge:

Bill Number and Bill Date	Telephone Number	Call Date	Connect Hour	Connect Minute	Usage Appearing on the Bill
508 Q05-0135 135 1/31/00	617-696-6394	1/31/00	7 (pm)	23	Phonesmart (*69) - \$0.41

The appearance of this usage is contrary to the format specified by the Billing Output Specifications. In addition, usage is not billed in the timeframe in which it is expected.

**Issue 41.15**

KPMG was charged more than it should have been for a local usage generated by an end user during the 12/31/99 bill period.<sup>2</sup> The following table illustrates this instance:

Telephone Number	Minutes Expected from DUF	Messages Expected from DUF	Minutes Appearing on Bill	Messages Appearing on Bill	Expected Charge	Actual Charge on Bill
413-564-8314	1	2	9	11	\$0.02 (messages) \$0.01 (minutes)	\$0.08 (messages) \$0.11 (minutes)

KPMG expected that two local calls would comprise the local usage generated by this end-user for the 12/31/99 bill period. Following is some information about those calls for the purpose of identifying the call records:

Called From Number	Called To Number	Date of Call	Connect Time Hour	Connect Time Minute	Call Duration Minute	Call Duration Second
413-564-8314	4135684214	12/7/99	11	24	0	41
413-564-8314	4137335131	12/14/99	10	36	0	0

<sup>1</sup> The Billing Output Specifications, SR – 1874, Vol. 4 – U21 defines *Usage Billing Cycle Thru Date* as the following: “For current usage, this represents the last date of the billing cycle in which the usage is billed.”

<sup>2</sup> The associated bill number is 508 Q05-0135 135. The rates KPMG used to calculate local usage charges can be found in DTE MA #10, Section 1.5.1, p. 14. These rates were then discounted by 24.99% per the reseller discount. The per minute rate KPMG used to perform the calculations is \$0.012002. The per message rate used is \$0.007501.

### Issue 41.16

KPMG was charged more than it should have been for toll calls made by its end users. The following table illustrates some examples of those instances:<sup>3</sup>

#	Telephone Number	Call Date	Connect Time Hour	Connect Time Minute	Conversation Time Minute <sup>4</sup>	Conversation Time Second	Expected Charge	Actual Charge on Bill
1	413-564-8306	12/17/99	9	57	0	17	\$0.02	\$1.15
2	413-564-8314	12/14/99	10	40	1	5	\$0.05	\$1.18
3	781-263-7010	12/14/99	10	39	0	30	\$0.04	\$0.20
4	781-292-9672	12/16/99	11	37	0	49	\$0.06	\$0.20

### Issue 41.17

KPMG was not billed for usage generated by BTN 781-368-0195 that should have appeared on KPMG's 12/31/99 resale bill (number 508 Q05-0135 135).<sup>5</sup> Following are the DUF records that include the usage data for this telephone number.

#	Category	Group	Record Type	From Number	To Number	Call Date	Connect Time Hour	Connect Time Minute	Connect Time Second
1	10	01	31	7813680195	7812767749	12/16/99	8	4	29
2	01	01	31	7813680195	7813680192	12/16/99	8	21	43
3	10	01	31	7813680195	7812767749	12/16/99	8	24	42
4	10	01	31	7813680195	7812767749	12/16/99	8	25	33
5	10	01	31	7813680195	7812767749	12/17/99	8	0	57
6	10	01	31	7813680195	7812767749	12/17/99	8	15	36
7	10	01	31	7813680195	7812767749	12/17/99	8	16	30
8	10	01	31	7813680195	7813680166	12/17/99	8	42	29
9	10	01	31	7813680195	7813680166	12/17/99	8	54	53
10	10	01	31	7813680195	7817296100	12/7/99	11	42	38
11	01	01	16	7813680195	7813680195	12/15/99	9	5	2
12	01	01	16	7813680195	7813680195	12/15/99	9	14	52
13	10	01	31	7813680195	7813680194	12/15/99	10	19	23
14	01	01	16	7813680195	7813680195	12/15/99	10	19	46

<sup>3</sup> All of these instances appear on KPMG's resale bill for the 12/31/99 bill date. The bill number is 508 Q05-0135 135.

<sup>4</sup> According to DTE MA Tariff #10, Part A, Section 9.5.2.E, p. 12, "...the charges for an individual call will be determined based upon the actual conversation time of each call in one second increments." KPMG applied usage rates in accordance with these rules. The rates applied by KPMG appear in DTE MA #10, Section 1.9.1, pp. 30 and 31 and were adjusted to reflect the 24.99% reseller discount. For items 1 and 2, the per message rate used for the calculations is \$0.007501; the per minute rate used is \$0.041256. For items 3 and 4, the per message rate used is \$0.007501; the per minute rate used is \$0.060008.

<sup>5</sup> This usage also did not appear on the 1/31/00 resale bill. This suggests, therefore, that the usage was *not* re-circulating, which could explain in some cases why usage might not appear as expected on a bill.

#	Category	Group	Record Type	From Number	To Number	Call Date	Connect Time Hour	Connect Time Minute	Connect Time Second
15	01	01	16	7813680195	7813680195	12/15/99	10	42	31
16	01	01	16	7813680195	7813680195	12/15/99	10	54	48
17	10	01	31	7813680195	7812767749	12/16/99	9	13	32
18	10	01	31	7813680195	7813680192	12/16/99	9	22	3
19	10	01	31	7813680195	7813680192	12/16/99	9	49	3
20	10	01	31	7813680195	7812767749	12/16/99	9	50	0
21	01	01	31	7813680195	7813680192	12/16/99	9	59	23
22	01	01	31	7813680195	7813680192	12/16/99	10	17	4
23	10	01	31	7813680195	7812767749	12/16/99	10	19	44
24	10	01	31	7813680195	7812767749	12/16/99	10	30	40
25	10	01	31	7813680195	7812728667	12/17/99	9	3	27
26	10	01	31	7813680195	7812767749	12/17/99	9	10	25
27	10	01	31	7813680195	7813680169	12/17/99	9	18	55
28	10	01	18	7813680195	7812728667	12/17/99	9	3	27
29	10	01	19	7813680195	7813680192	12/16/99	10	21	50
30	10	01	19	7813680195	7813680166	12/17/99	8	53	14
31	10	01	31	7813680195	6179881319	12/15/99	8	52	54
32	10	01	31	7813680195	6179881319	12/15/99	8	54	24
33	10	01	31	7813680195	6179881319	12/16/99	8	0	22
34	10	01	31	7813680195	6179881319	12/16/99	8	3	49
35	10	01	31	7813680195	6179881319	12/16/99	8	6	10
36	10	01	31	7813680195	6179881319	12/16/99	8	8	33
37	10	01	31	7813680195	6179881319	12/16/99	8	17	0
38	10	01	31	7813680195	6179881319	12/16/99	8	33	41
39	10	01	31	7813680195	6179881319	12/16/99	8	54	49
40	10	01	31	7813680195	6179881319	12/17/99	8	43	56
41	10	01	31	7813680195	6179881520	12/7/99	11	45	10
42	10	01	31	7813680195	6179881319	12/15/99	10	56	46
43	10	01	31	7813680195	6179881319	12/16/99	10	34	49
44	10	01	31	7813680195	6179881319	12/17/99	9	49	59
45	10	01	01	7813680195	9785510055	12/15/99	9	6	28
46	10	01	01	7813680195	9785510055	12/15/99	9	20	41
47	10	01	01	7813680195	9783746091	12/16/99	8	9	31
48	10	01	01	7813680195	9786862396	12/16/99	8	31	37
49	10	01	01	7813680195	9783746091	12/17/99	8	10	21
50	10	01	01	7813680195	9783746091	12/17/99	8	21	59

### **Assessment**

If CLECs are not billed charges that are complete, known, correct and billed in a timely manner they will have difficulty billing their end users appropriately.

March 7, 2000

## **OBSERVATION REPORT #42**

**KPMG observed an unexpected and not communicated process change with regard to referencing Customer Service Records (CSR).**

### **Issue**

Several Customer Service Records (CSR) associated with KPMG bills do not have the page number column populated in the Service Inventory section of the CSR. The bills carried the Page Number Reference on the December and January bills. February bills do not carry the Page Number Reference.

Following are the bills in which the associated CSR does not contain this data:

<b>Item No.</b>	<b>Bill Type</b>	<b>Bill Number</b>	<b>Bill Date</b>
1.	M40	617 M40-0021 673	02/04/00
2.	M40	413 M40-0004 500	02/04/00
3.	Y40	617 Y40-0013 156	02/06/00
4.	Y40	413 Y40-0014 104	02/06/00

### **Assessment**

The change in process of referencing Customer Service Records (CSR) was unexpected and not communicated for the CLEC. The missing reference contradicts the correct format of the Customer Service Record and makes it more difficult for CLECs to locate data within a CSR related a specific account.

March 13, 2000

**OBSERVATION REPORT #48**

**A charge on KPMG's M40 bill is incorrectly prorated.**

**Issue**

The charges for service order # C5TT4626 on KPMG's February 6, 2000 M40 bill (bill number 617 M40-0021 673) are prorated incorrectly. Given the *from* and *thru* dates on the bill for the access service that was added, KPMG expects to be charged \$1.33 for the USOC SP1LR and \$95.80 for the USOC ULC1X instead of \$1.38 and \$99.22 respectively as appears on the bill.

**Assessment**

If charges are prorated incorrectly by Bell Atlantic, CLECs will be billed incorrectly.

March 21, 2000

## **OBSERVATION REPORT #50**

**KPMG observed that the file names of certain billing files sent via NDM by Bell Atlantic differ from the agreed upon file naming convention.**

### **Issue**

Carrier Access Billing System (CABS) files are sent to KPMG with the following naming convention:

**RBOC CABS State . AECN . BillDate . UID**

For example,

**BACABSMA.URNK.20000106.02727141100002a000**

KPMG has observed that several CABS billing files have an incorrect file name given the bill date<sup>1</sup> of the bill enclosed in the file:

#	Bill Date	CABS File Name
1	12/31/99	BACABSMA.RNKU.1999XXXX.22352111100002a000
2	12/04/99	BACABSMA.ZKPM.19991104.25443141219991a000
3	12/06/99	BACABSMA.ZKPM.19991104.30002160100002a000
4	11/06/99	BACABSMA.ZKPM.19991104.81212103219991a000
5	01/04/00	BACABSMA.ZKPM.19991104.93557101100002a000
6	02/04/00	BACABSMA.ZKPM.20000104.22947111200002a000
7	01/15/00	BACABSMA.ZPSC.19991231.05426182100002a000
8	12/31/99	BACABSMA.ZPSC.1999XXXX.63952111100002a000
9	01/15/00	BACABSMA.ZTPS.19991231.25426182100002a000
10	12/31/00	BACABSMA.ZTPS.1999XXXX.32203111100002a000

### **Assessment**

CLECs, believing the naming convention to be correct, cannot accurately determine the timeliness of bill delivery with respect to the bill date without opening the file. In addition, a CLEC may process the file, believing it is for one bill date when it is actually for another. As a result, the CLEC could generate bills for an incorrect month or in an untimely manner.

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<sup>1</sup> Bill date is expressed as YYYYMMDD.

March 21, 2000

## **OBSERVATION #51**

**A service order on KPMG's Y40 bill appears to be incorrectly prorated.**

### **Issue**

Service order # C5UP8072 on KPMG's February Y40 bill appears to be incorrectly prorated.<sup>1</sup> Given the "from and thru" dates of January 14 to February 5, 2000, the service order charges should have been prorated based upon 21 days. Instead, the charges appear to be prorated using 22 days.

### **Assessment**

If service order charges are not prorated correctly, CLECs will not be billed the appropriate amount.

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<sup>1</sup> The associated purchase order number is 21412131999001, and the bill number is 617 Y40-0013 156. The account telephone number is 781-292-9671.

March 21, 2000

## **OBSERVATION REPORT #54**

**The rates displayed on KPMG's Administrative bill appear to be incorrect.**

### **Issue**

On KPMG's Administrative bill,<sup>1</sup> the rates for *records processed* and *local usage transmission* do not appear correctly on the bill.

	<b>Tariff Rate<sup>2</sup></b>	<b>Rate Displayed on the Bill</b>
<b>Records Processed</b>	\$0.004085	\$0.00408
<b>Local Usage Transmission</b>	\$0.000118	\$0.00011

KPMG cannot determine whether this rate is simply truncated on the bill display or if the rate used by BA in charging for these services is incorrect.

### **Assessment**

If the rates displayed on the Administrative bills are incorrect, CLECs will have difficulty validating that they are being charged correctly by Bell Atlantic.

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<sup>1</sup> The bill number is 508 Q10-0068 068 005 2. The bill periods included in this observation are December 5, 1999 – January 4, 2000 and January 5 – February 4, 2000.

<sup>2</sup> The tariff rate can be found in DTE MA #14, Section 10.8.1, p. 8.



## **OBSERVATION REPORT #56**

**KPMG has found two different versions of collocation application forms posted on Bell Atlantic's Wholesale Markets web site.**

### **Issue**

There are two different versions of the collocation application forms posted on Bell Atlantic's Wholesale Markets web site.

The first version of the form (which indicates a January 6, 2000 release date) is located at:

[http://www.bellatlantic.com/wholesale/html/word/res\\_col\\_ap.doc](http://www.bellatlantic.com/wholesale/html/word/res_col_ap.doc)

The other version (which indicates a March 1, 2000 release date) is located at:

[http://www.bellatlantic.com/wholesale/html/handbooks/clec/volume\\_1/c1s8\\_5\\_9a.doc](http://www.bellatlantic.com/wholesale/html/handbooks/clec/volume_1/c1s8_5_9a.doc)

The applications contain different text and field formats.

### **Assessment**

If a CLEC submits an incorrect version of the collocation application form, the processing of the form could be delayed or rejected.

## OBSERVATION REPORT #57

KPMG observed missing DUF records for usage and conversation time.

### Issue 57.1

KPMG was billed for usage on telephone numbers that did not generate usage for the indicated period.

#	Bill Number	Bill Date	Telephone Number	Usage Appearing on the Bill
1	508 Q05-0135 135	1/31/00	617-696-6394	Local usage - \$0.03 Phonesmart (*69) - \$0.41
2	508 Q05-0135 135	1/31/00	413-564-8302	Local usage - \$0.12
3	508 Q05-0135 135	1/31/00	617-357-0572	Local usage - \$0.02
4	508 Q05-0136 136	2/15/00	617-926-8293	Local usage - \$0.03
5	508 Q05-0135 135	12/31/99	617-372-8517	Local usage - \$0.09
6	508 Q05-0135 135	12/31/99	781-721-4979 <sup>1</sup>	Local usage - \$1.24

### Issue 57.2

Conversation time was not populated on the associated DUF records for billed third party and collect calls, preventing KPMG from correctly calculating total usage charges for a particular telephone number.

Following are examples of the discrepancies between expected and actual usage charges that appear on the bill:

Item No.	Bill Number	Bill Date	Telephone No.
1.	508 Q05-0135 135	12/31/99	413-564-8305
2.	508 Q05-0135 135	12/31/99	617-372-8479
3.	508 Q05-0135 135	12/31/99	781-292-9643

The table below outlines information about these calls to identify in the DUF records:

Category	Group	Record Type	Date of Record	From Number	To Number	Billing Number	Connect Time Hour	Connect Time Minute	Connect Time Second
01	01	01	12/15/99	4135648302	4134437171	4135648305	9	20	58
01	01	31	12/17/99	4135648306	4135648305	4135648305	9	41	44
01	01	31	12/17/99	4135648313	4137335131	4135648305	11	15	30

<sup>1</sup> For this telephone number, KPMG is aware that 5 bill to third party/collect calls were billed to this account. However, because these calls were billed to third party/collect calls, they were not expected to appear in the local calling charges section of the bill - typically, they are billed in the "Itemized Calls" bill section. Consequently, the presence of these calls would not explain why local usage charges for this telephone number appear when no such charges were expected.

Category	Group	Record Type	Date of Record	From Number	To Number	Billing Number	Connect Time Hour	Connect Time Minute	Connect Time Second
01	01	31	12/16/99	4135648302	4135648305	4135648305	10	1	5
01	01	31	12/15/99	4135648306	4135648305	4135648305	13	25	30
01	01	31	12/17/99	6173728512	6173728479	6173728479	12	56	51
01	01	31	12/17/99	6173728510	6173728479	6173728479	9	21	1
01	01	31	12/17/99	6173728510	6176621267	6173728479	10	18	27
01	01	31	12/14/99	6173728478	6173728479	6173728479	14	53	26
01	01	31	12/14/99	6173728510	6173728479	6173728479	10	31	20
01	01	31	12/16/99	7812929672	7814557559	7812929643	11	49	29
01	01	31	12/16/99	7812929672	7812929643	7812929643	10	11	8
01	01	31	12/14/99	7812929642	7812929643	7812929643	10	59	13
01	01	31	12/15/99	7812929642	7812929643	7812929643	9	48	17

### **Assessment**

If usage or conversation time are not provided in DUF records, CLECs cannot validate usage charges appearing on their bills. Consequently, CLECs may have difficulty billing their end-users appropriately.

## **OBSERVATION REPORT #59**

**KPMG is unable to process Directory Listing Service orders submitted via EDI.**

### **Issue 59.1**

The following Directory Listing Service orders received queries that do not allow KPMG to proceed with these platform orders.

#	Order PON/VER	Date/Time Submitted	Query
1	015051P70X010012/AA	3/31/00 11:26 AM	"This is an AECN ID. It should be put through the CLEC GUI."
2	015051P70X010012/AB	4/3/00 4:05 PM	"ZKPM is a CLEC ID. It must be input via the CLEC GUI. It is reaching the resale acct group. We can not process your request."

### **Issue 59.2**

For the two orders above, #1 and #2, the Bell Atlantic response/query did not provide KPMG with any contact information for the representative who worked the order.

### **Issue 59.3**

The following phone calls made to the New England TISOC did not provide any additional information.

#	Date/Time	Phone Number Called	Rep	Rep Comments
3	4/3/00 2:45 PM	888 470-0777	Jeff	"Can not find the PON or anything under the BTN"
4	4/3/00 3:00 PM	888 470-0777	Dennis	"Can not find the PON or anything under the BTN. The PON is lost, please resend"

### **Assessment**

Incomplete or inaccurate information provided by Bell Atlantic representatives on order responses can result in a CLECs inability to track orders and respond to error conditions.

## **OBSERVATION REPORT #61**

**KPMG observed that the CLEC Handbook and the CLEC Contact Lists on BA's TIS web site do not provide complete process descriptions, contact lists, or help desk numbers.**

### **Issue 61.1**

The TISOC processes and contact information contained in the Volumes I and II of the CLEC Handbook on BA's TIS web site are incomplete. Section 5.3 of Volume II- Help Desk and Assistance Information, refers users to Volume I Section 8.1 for additional information regarding the "TISOC group and hours of operation." The information in Section 8.1, however, is incomplete. Examples of missing, incomplete, or outdated information are:

- New England UNE Loop Center contacts
- UNE DSL & Premium Loop Center contacts
- Description of the TISOC process in either Section 5.3 or 8.1
  - The other sub-sections of Section 5.3 include organizations' responsibilities and examples of which problems would be addressed to each
- TISOC hours of operation

### **Issue 61.2**

The CLEC Contact list located on the BA Wholesale web site ([http://www.bellatlantic.com/wholesale/html/con\\_clec\\_list.htm](http://www.bellatlantic.com/wholesale/html/con_clec_list.htm)) is incomplete. Examples of missing, incomplete, or outdated information include:

- New England UNE Loop TISOC contacts
- UNE DSL & Premium Loop TISOC contacts
- Management levels (1st, 2nd) used in the documented escalation process ([http://www.bellatlantic.com/wholesale/html/res\\_escalate\\_clec.htm](http://www.bellatlantic.com/wholesale/html/res_escalate_clec.htm)) which links to this page
- Information on the Ordering (North) Help Desk or on BA System Support

### **Assessment**

Inadequate information about available resources, including TISOC organizations and their responsibilities, may cause uncertainty among CLECs regarding standard procedure. Furthermore, the inconsistent information surrounding the TISOCs may inhibit or delay a CLEC's ability to do business.

## **OBSERVATION REPORT #65**

**Based on Unbundler Scenario #4, KPMG was not charged as expected on its February bill for usage generated in the Winchester end office.**

### **Issue**

KPMG was not charged for usage generated in the WNCHMAMADS1 end office that should have appeared on the February 6, 2000 bill (bill number 617 Y40-0013 156). Following is Daily Usage Feed information associated with the call KPMG expected to be charged for in February (Unbundler Scenario #4 was used to rate this message):

<b>Record Type</b>	<b>Date of Record</b>	<b>From Number</b>	<b>To Number</b>	<b>Billing Number</b>	<b>Connect Time Hour</b>	<b>Connect Time Minute</b>	<b>Connect Time Second</b>
10 01 01	1/15/00	7813680197	9784465075	7813680197	13	45	52

In addition, charges for this call did not appear on the subsequent March bill.

### **Assessment**

If CLECs are not billed correctly, they cannot bill their end users correctly.

The CLEC is unable to verify the accuracy of the charges in the Usage section of the bill for UNE services provided by Bell Atlantic.

## **ADDENDUM #1 TO OBSERVATION REPORT #66**

**KPMG observed that several rate elements expected on the bill, based on the DUF records received, did not appear on the bill.**

### **Issue 66.2**

Below is a list of the missing rate elements, which did not appear on the bills but were expected based on the DUF records.

	End office	Rate Element	Bill Period	Quantity from DUF	Quantity on Bill	Amount on DUF	Amount on Bill	Scenario
1	BSTNMABODS9	UTTC1	Jan. 6, 2000	3	none	\$0.01	none	#12B, #19B
2	BSTNMABODS9	UTCTC	Jan. 6, 2000	6	none	\$0.01	none	#15NE
3	NDHMMAPIDS0	BLVC	Jan. 6, 2000	1	none	\$0.02	none	#34
4	NDHMMAPIDS0	UTCTC	Jan. 6, 2000	3	none	\$0.02	none	#15NE
5	NDHMMAPIDS0 <sup>1</sup>	ULSC	Feb. 6, 2000	8	none	\$0.15	none	#1, #3
6	WLSLMALADS1	OWC	Jan. 6, 2000	1	none	\$0.01	none	#40B
7	WLSLMALADS1	UTCTC	Jan. 6, 2000	5	none	\$0.03	none	#15NE
8	WNCHMAMADS1	UTCTC	Jan. 6, 2000	22	none	\$0.13	none	#15NE
9	WSFDMAWADS0	UTCTC	Jan. 6, 2000	26	none	\$0.30	none	#15NE

### **Assessment**

The CLEC is unable to verify the accuracy of the charges in the Usage section of the bill for UNE services provided by Bell Atlantic.

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<sup>1</sup> No usage was received for the Needham EO in the February 6, 2000 bill. All the calls generating these charges were intraswitched calls.



## **ADDENDUM #2 TO OBSERVATION REPORT #66**

**KPMG observed that several rate elements expected on the bill, based on the DUF records received, did not appear on the bill.**

### **Issue 66.3**

Below is a list of the missing rate elements, which did not appear on the bills but were expected based on the DUF records.

#	End office	Rate Element	Bill Period	Quantity from DUF	Quantity on Bill	Amount on DUF	Amount on Bill	Scenario
1	BSTNMABODS9	UTCTC	Jan. 6, 2000	6	none	\$0.01	none	#15NE
2	NDHMMAPIDS0	UTCTC	Jan. 6, 2000	3	none	\$0.02	none	#15NE
3	NDHMMAPIDS0 <sup>1</sup>	ULSC	Feb. 6, 2000	8	none	\$0.15	none	#1, #3
4	WLSLMALADS1	OWC	Jan. 6, 2000	1	none	\$0.01	none	#40B
5	WLSLMALADS1	UTCTC	Jan. 6, 2000	5	none	\$0.03	none	#15NE
6	WNCHMAMADS1	UTCTC	Jan. 6, 2000	22	none	\$0.13	none	#15NE
7	WSFDMAWADS0	UTCTC	Jan. 6, 2000	26	none	\$0.30	none	#15NE

### **Assessment**

The CLEC is unable to verify the accuracy of the charges in the Usage section of the bill for UNE services provided by Bell Atlantic.

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<sup>1</sup> No usage was received for the Needham EO in the February 6, 2000 bill. All the calls generating these charges were intraswitched calls.